

EXHIBIT A
PLAINTIFFS' ATTORNEY/PARALEGAL TIME INVOICES

Totals Per Case:

Bell Case:

Timekeeper	Time	Hourly Rate	Total
T. Martin (Exhibit A 1)	230.80	\$400	\$92,320
K. Martin (Exhibit A 2)	104.00	\$400	\$41,600
M. Smith (Exhibit A 3)	124	\$150	\$18,600

Bell Fee Total:\$152,520

Hall Case:

Timekeeper	Time	Hourly Rate	Total
T. Martin (Exhibit A 4)	5.80	\$400	\$2,320
K. Martin (Exhibit A 4)	1.00	\$400	\$400

Total Fees Hall: \$2,720

EXHIBIT A 1
Bell et al v. Accord Services et al
Attorney Time for T. Martin

Date 2016			Hours
1/11	Review Offers of Judgment by Defendants		.20
1/18	Depo Preparation – review Rog responses of Guzman, Bell, Brown; Initial discl; Jt Report; and Case Outline prepared by K. Martin; Offer of Judgment counteroffer; Dfs initial settlement offer. Review Plfs Bates docs 1-143.		2.50
1/19	Conference with Plaintiffs in preparation of deposition		2.00
1/21	Conferences with Plaintiff Bell, defend deposition of Plaintiff Bell		4.30
1/21	Conferences with Plaintiff Guzman, defend deposition of Plaintiff Guzman		4.80
1/26	Review Defendants' responses to written discovery and responses to Defendants' interrogatories from Hart and Taylor.		.50
1/29	Review Joint Motion for Approval of Rule of 502(d) Order		.30
1/30	Review additional document production (80 pages of Disc Docs)		.40
1/30	Review additional document production (118 pages of Disc Docs)		.30
1/30	Review Plaintiffs' Discovery Requests and Defendants Discovery Requests		.40
1/30	Review Plaintiffs' Hart & Taylor Discovery Responses in preparation for depositions		.40
1/30	Draft Plaintiffs' First Good Faith Notice		1.10
1/31	Research caselaw regarding discovery issues, good faith defense, exemption issues in preparation of drafting Plaintiffs' Second Good Faith Notice and draft same		2.50
2/1	Review and production of Plaintiff Hart's documents – 20 pgs		.30

2/2	Review and production of Plaintiff Bell's documents – 47 pgs		.50
2/2	Plaintiffs' Motion to Extend Discovery		.80
2/2	Research willfulness, primary duties, and exemption issues under the FLSA		1.50
2/3	Review relevant documents and pleadings and draft Plaintiff Shana Bell's First Continuing Interrogatories to Accord Services, LLC		1.90
2/3	Research similar cases involving staffing employees and determine relevance to instant case		.80
2/3	On-Line searches of Defendant Accord, e.g. https://www.smartrecruiters.com/AccordServices/73348684-home-health-care-staffing-coordinator-in-Marietta		1.20
2/3	Review Defendants' Motion to Modify Order Granting Discovery Extension by Accord Services, LLC		.30
2/3	Review Defendants' documents (150+ pages)		.60
2/3	Review Defendants' documents (15+ pages)		.10
2/3	Review Buffer and On Call daily shift report schedules prepared by K. Martin (4 reports: 2012, 2013, 2013, 2015)		.40
2/4	Review and notate deposition transcript of Plaintiff Bell (141 pgs)		.70
2/4	Review and notate deposition transcript of Plaintiff Guzman (181 pgs)		.80
2/4	Draft Plaintiffs' Response to Defendants' Motion to Modify Order		2.50
2/4	Review the Court's Order denying Defendants' Motion to Modify the Court Order		.10
2/5	Downloaded from the Web and reviewed on 2/5/16 various pages from Defendant Accord Website		.20
2/5	Review documents, Defendants' Responses to Plaintiffs' First Request for Documents in preparation of drafting additional Requests for Production of Documents to Defendant Accord Services and draft same		1.20
2/6	Research compensability of on-call time related		2.60

	to Plaintiffs' on-call and buffer shifts		
2/8	Review Defendants' Amended Responses to Plaintiffs' First Interrogatories		.20
2/8	Review Plaintiff Brown's responses to questions from counsel		.30
2/10	Draft Plaintiff Guzman Request for Production of Documents		.90
2/10	Draft Plaintiff Guzmans First Continuing Interrogatories to Accord Services, LLC		.80
2/12	Review Defendants' Amended Responses to Plaintiffs' First Interrogatories by Accord Services, LLC		.30
2/12	Review legal memo regarding "salary basis" requirement and exempt vs. non-exempt issues and review relevant cases cited		1.10
2/15	Review Defendants' Amended Responses to Plaintiffs' Interrogatories to Defendants		.40
2/15	Review Defendants' Amended Responses to Plaintiffs' First Request for Production of Documents		.40
2/16	Review Deposition Notice for Plaintiff Brown, review Deposition Notice for Plaintiff Hart, review Deposition Notice for Plaintiff Taylor		.20
2/16	Review Plaintiff Hart's responses to questions from Counsel		.30
2/16	Review Plaintiff Taylor's responses to questions from Counsel		.30
2/16	Review Plaintiff Bell's responses to questions from Counsel		.30
2/21	Draft Plaintiff Brown's First Continuing Interrogatories to Defendant Accord Services, LLC		.70
2/22	Conferences with Plaintiff Hart related to her deposition and defend deposition of Plaintiff Hart		6.60
2/23	Conferences with Plaintiff Taylor related to her deposition and defend deposition of Plaintiff Taylor		6.50
2/24	Prepare for the deposition of D. Dillon		1.50

2/25	Prepare for deposition of D. Dillon and take deposition of same		5.30
2/27	Draft Plaintiff Brown's Request for Production of Documents to Defendant Accord		.80
2/28	Review information from Plaintiff Bell		1.10
2/28	Defendant Plaintiff Taylor's Request for Production of Documents to Defendant Accord		.80
2/28	Prepare for deposition of K. Adams including her affidavit and pages of her deposition transcript from a prior case		1.40
2/29	Take deposition of K. Adams		.90
3/1	Review Defendants' Second Request for Production of Documents to Plaintiff Bell, review Defendants' Second Request for Production of Documents to Plaintiff Brown, review Defendants' Second Request for Production of Documents to Plaintiff Brown, review Defendants' Second Request for Production of Documents to Plaintiff Taylor, review Defendants' Second Request for Production of Documents to Plaintiff Hart		.50
3/4	Review Defendant's Responses to Plaintiff Bell's Interrogatories to Defendant Accord		.20
3/7	Review Defendant's Responses to Plaintiff Bell's Request for Production of Documents to Defendant Accord and draft Plaintiffs' Fourth Good Faith Discovery Notice		1.50
3/9	Review sample 30(b)(6) notice in preparation for corporate witness testimony		.30
3/9	Received and Reviewed Judge Totenberg's updated Standing Order.		.20
3/11	Review Defendant's Response to Plaintiff Guzman's Request for Production of Documents and Interrogatories		.50
3/13	Review Plaintiff Bell's emails regarding "buffer" culled by paralegal from discovery documents from Defendant		.50
3/15	Review and notation of deposition transcript of Dillon		1.00
3/18	Draft good faith discovery request regarding		.50

	Plaintiffs' good faith request related to Defendants' responses to Plaintiff Guzman's discovery requests		
3/22	Review Defendants' Responses to Plaintiff Brown's Interrogatories to Defendant Accord		.30
3/24	Review, revise Plaintiffs' Notice of 30(b)(6) Deposition		2.50
3/24	Draft Plaintiffs' Notice of Deposition of Defendant Steven Adams		.20
3/24	Prepare Joint Consolidated Statement and Plaintiffs' position on discovery issues and review relevant caselaw regarding same		1.20
3/25	Review data from paralegal regarding phone calls made and received by Plaintiff Brown while "on-call," "buffer," or both.		1.00
3/26	Review phone bills annotated by paralegal for Plaintiff Brown's "on call," "buffer" shifts or both		.50
3/27	Deposition preparation for 30(b)(6) deposition and review relevant documents regarding same		1.60
3/28	Deposition preparation for corporate deposition and take deposition of K. Adams as corporate witness and conference with Court regarding same		1.90
3/28	Review Defendants' Responses to Plaintiff Brown's Request for Production of Documents		.40
3/29	Continue research on staffing employees classification under the FLSA		.90
3/29	Review Defendants' Responses to Plaintiff Taylor's Request for Production of Documents		.30
3/29	Conferences with Plaintiff Brown and defend deposition of Plaintiff Brown		5.30
3/29	Review Minute Entry for Judge Totenberg regarding 30(b)(6) deposition		.10
3/30	Continued review and notation of deposition transcript		.80
3/30	Continue research on staffing employees classification under the FLSA and related case pleadings, e.g. motions for summary judgment and responses/replies to same		2.70

3/30	Deposition preparation of Defendant Adams		.50
3/31	Deposition preparation of Defendant Adams and take deposition of same		2.80
4/1	Review annotated phone records related to Plaintiff Taylor's on-call and/or buffer shifts.		.40
4/1	Research FLSA exemption/classification issues for Plaintiffs		2.80
4/1	Review data from paralegal related to phone calls for each on-call and/or buffer shifts worked by Plaintiff Taylor		.50
4/1	Draft individual responses for each of five Plaintiffs' in response to Defendants' Second Request for Documents		2.10
4/2	Pull relevant staffing overtime/FLSA cases and related pleadings to same and prepare in-depth analysis and pull all cases cited within cases to analyze relevance to instant case		3.50
4/3	Review updated data regarding phone calls for each time Plaintiff Taylor worked on-call and/or buffer shifts		.20
4/4	Review Plaintiffs' 30(b)(6) Deposition Notice and relevant legal caselaw and draft Revised Proposed Topics for 2 nd attempt at deposing 30(b)(6) witness		1.50
4/10	Review relevant documents, information in preparation for deposition of Defendant Accord's corporate witness and preparation of same		2.00
4/11	Prepare for, review relevant documents in preparation of deposition of S. Adams and take deposition of Defendant S. Adams as Defendant Accord's corporate witness		2.50
4/13	Review Second Joint Consolidated Statement and prepare Plaintiffs' responses for same		.40
4/15	Telephone conference with Judge Totenberg		.50
4/29	Prepare Plaintiffs' Continuing Interrogatories to Defendants		.90
4/29	[Proposed] Rule 502(d) Order		.20
5/7	Additional research on willfulness and damages permitted under FLSA		.80

5/11	Research recordkeeping requirements under the FLSA		.80
5/17	Draft Plaintiffs' Amended Complaint		.40
5/31	Review company policies and documents produced by Defendants		1.50
6/1	Revise Plaintiffs' Amended Complaint		.30
6/2	Review Draft Joint Motion to Stay Proceedings		.10
6/6	Review Court Orders		.10
6/9	Review engagement agreement from Mediator		.20
6/9	Review Mediator's "Credentials"		.20
6/14	Review Plaintiffs' prior settlement offer and calculation in preparation for mediation		.20
6/20	Review Defendants' prior settlement offer and Defendants' reasoning		.20
6/21	Review documents, caselaw and information related to case and draft statement regarding case and forward same to Mediator in preparation for mediation		3.00
6/21	Review caselaw research regarding Administrative Exemption and draft analysis of Administrative Exemption and provide to Mediator		2.10
6/21	Draft additional analysis of job position and duties and the FLSA exemptions and provide to Mediator		1.40
6/22	Prepare table to support initial demand to be made at mediation and forward same to Mediator		.80
May, June	Over course of period of time from May until June 23 at mediation: review documents and data compiled by paralegal from tens of thousands of electronic documents and determine on-call and buffer shifts worked by each Plaintiff and calculate damages for each Plaintiff in preparation for mediation (6 Hours) Hart (5.50 Hours) Bell (3.50 Hours) Taylor (3.50 Hours) Brown (2 Hours) Hall (0 hours – done while at mediation)		20.50
6/23	Mediation – all day – with Mediator Dan Klein		14.00

All	Total telephone conferences – (<u>See</u> below for details)		4.90
All	Time spent on Emails TF Martin January 2016 forward. Read, Review, Draft, Edit, forward, respond to, etc. (<u>See</u> attached e-mail logs)		60.30
July	Review of Draft Settlement Agreements and Motion to Approve Settlement		1.50

Phone Records for Attorney T. Martin

Date	Phone Call to or From	Time
1/19/16	404-825-4242 Shana Bell	2
1/31/16	678-849-8763 Mike Smith (ParaLegal)	2
2/3/16	404-234-0041 Angela Hart	2
2/16/16	404-368-4291Gomez	3
2/22/16	404-234-0041 Angela Hart	1
2/22/16	678-360-0865 Jasmine Brown	1
2/23/16	678-849-8763 Mike Smith(ParaLegal)	7
2/27/16	404-825-4242 Shana Bell	13
2/29/16	404-825-4242 Shana Bell	19
3/14/16	404-825-4242 Shana Bell	5
3/9/16	404-234-0041 Angela Hart	10
3/22	404-234-0041 Angela Hart	4
3/01	678-849-8763 Mike Smith(ParaLegal)	1
3/21	678-849-8763 Mike Smith(ParaLegal)	2
3/7	678-849-8763 Mike Smith(ParaLegal)	8
3/22	678-849-8763 Mike Smith(ParaLegal)	1
3/11	678-849-8763 Mike Smith(ParaLegal)	5
3/12	678-849-8763 Mike Smith(ParaLegal)	4
3/18	678-849-8763 Mike Smith(ParaLegal)	1
3/18	678-849-8763 Mike Smith(ParaLegal)	1
3/18	678-849-8763 Mike Smith(ParaLegal)	2
3/18	678-849-8763 Mike Smith(ParaLegal)	4
3/19	678-849-8763 Mike Smith(ParaLegal)	2
3/23	678-849-8763 Mike Smith(ParaLegal)	1
3/23	678-849-8763 Mike Smith(ParaLegal)	1
3/24	678-849-8763 Mike Smith(ParaLegal)	1
3/24	678-849-8763 Mike Smith(ParaLegal)	4
3/29	678-849-8763 Mike Smith(ParaLegal)	2
3/29	678-849-8763 Mike Smith(ParaLegal)	1
4/1	678-849-8763 Mike Smith(ParaLegal)	1
4/1	678-849-8763 Mike Smith(ParaLegal)	2
4/3	678-849-8763 Mike Smith(ParaLegal)	1
4/3	678-849-8763 Mike Smith(ParaLegal)	1
2/7	678-849-8763 Mike Smith(ParaLegal)	1
2/11	678-849-8763 Mike Smith(ParaLegal)	2
2/13	678-849-8763 Mike Smith(ParaLegal)	1

2/24	678-849-8763 Mike Smith(ParaLegal)	2
2/24	678-849-8763 Mike Smith(ParaLegal)	1
2/24	678-849-8763 Mike Smith(ParaLegal)	9
4/15	404-567-4399 Conf Call with Judge	70
4/20	404-567-4395 Atty Nations	11
4/19	678-849-8763 Mike Smith(ParaLegal)	1
4/19	678-849-8763 Mike Smith (ParaLegal)	1
5/4	678-849-8763 Mike Smith(ParaLegal)	1
5/4	678-849-8763 Mike Smith(ParaLegal)	3
5/20	404-567-4372 Atty Stillwagon	15
6/2	404-567-4372 Atty Stillwagon	11
6/6	404-567-4372 Atty Stillwagon	3
6/6	404-567-4372 Atty Stillwagon	8
5/20	404-567-4395 Atty Nations	3
5/20	404-825-4242 Shana Bell	2
6/6	678-849-8763 Mike Smith(ParaLegal)	2
6/6	678-849-8763 Mike Smith(ParaLegal)	2
5/11	678-849-8763 Mike Smith(ParaLegal)	1
5/12	678-849-8763 Mike Smith(ParaLegal)	1
5/12	678-849-8763 Mike Smith(ParaLegal)	1
5/13	678-849-8763 Mike Smith(ParaLegal)	1
5/13	678-849-8763 Mike Smith(ParaLegal)	1
5/22	678-849-8763 Mike Smith(ParaLegal)	1
5/22	678-849-8763 Mike Smith(ParaLegal)	1
5/23	678-849-8763 Mike Smith(ParaLegal)	3
5/23	678-849-8763 Mike Smith(ParaLegal)	2
	Total Minutes	276
	Total Hours	4.6

EXHIBIT A 2
Bell et al v. Accord Services et al
Attorney Time for K. Martin

Date	Description	Time
03-25-15	Telephone conference with S. Bell regarding possible case	.30
03-26-15	Electronic conference with S. Bell regarding additional information needed to assess case and general information about federal overtime cases	.20
03-28-15	Multiple detailed electronic conferences with S. Bell regarding case and review of information provided by S. Bell to assess case	.50
03-30-15	Review information provided by A. Hart to assess case	.20
03-31-15	Electronic conference with S. Bell regarding possible case	.10
04-01-15	Electronic conference with A. Hart regarding case (.10); review and research relevant FLSA case law regarding FLSA classification in preparation of drafting Complaint and draft same (2.30); research company information (.20); electronic communications with clients regarding Fee Agreement and Complaint (.20); electronic conference with T. Martin regarding case (.10)	2.90
04-09-15	Electronic conference with T. Martin regarding Complaint (.10)	.10
04-13-15	Provide clients with information regarding Complaint, discovery, deadlines, information/documents needed to gather and produce, etc. (1.00); electronic conference with S. Bell	1.10

	regarding case (.10);	
04-15-15	Electronic conference with S. Bell regarding case (.10)	.10
04-20-15	Electronic conferences with clients regarding case (.20)	.20
04-21-15	Review Court Order reassigning case (.10)	.10
04-22-15	Electronic conference with clients regarding Complaint (.10)	.10
04-23-15	Review Guidelines for Discovery and Motion Practice and Judge Totenberg's Order regarding FLSA settlements (.10)	.10
04-27-15	Detailed electronic conferences with clients regarding case status and preparation for discovery (.50)	.50
04-30-15	Electronic conference with T. Martin regarding service of Complaint (.10)	.10
05-18-15	Electronic conference with clients regarding information needed regarding their employment (.10)	.10
05-19-15	Electronic conferences with S. Bell regarding information about her employment with Defendants (.20); electronic conference with J. Taylor regarding her employment with Defendants (.10); electronic conference with G. Guzman regarding details of his employment with Defendants (.10); electronic conferences with A. Hart regarding details of her employment with Defendants (.20); electronic conferences with J. Brown regarding details of her employment with Defendants (.20)	.70
05-22-15	Review Defendants' Answer to Complaint (.20)	.20
05-26-15	Electronic conferences with clients regarding details of Defendants' Answer (.20)	.20
06-02-15	Electronic conferences with clients	1.50

	regarding questions regarding Defendants' Answer, information and documents needed for discovery and for calculation of possible settlement (.50); review information provided by S. Bell in response (.20); review information provided by G. Guzman in response (.20); review information provided by A. Hart in response (.20); review information provided by J. Taylor in response (.20); review information provided by J. Brown in response (.20)	
06-03-15	Electronic conference with clients regarding case (.10)	.10
06-04-15	Prepare for conference call with clients by review of documents and information provided by clients, research FLSA caselaw, including on-call caselaw, and by drafting legal memo to file, drafting possible settlement chart, and drafting outline of topics for conference call (6.0); conduct conference call with clients regarding case details (1.10)	7.10
06-08-15	Review documents and information provided by S. Bell (.50); electronic conferences with opposing counsel, J. Wymer, regarding set up of discovery conference (.10)	.60
06-09-15	Electronic conferences with opposing counsel, J. Wymer, regarding set up of discovery conference (.10)	.10
06-10-15	Electronic conferences with J. Wymer regarding set up of discovery conference (.10); review Defendant's Corporate Disclosure Statement (.10)	.20
06-11-15	Telephone conference with J. Wymer and B. Stillwagon to conduct discovery conference (.20); electronic conferences with clients regarding discovery	.90

	conference, pay plan, possible settlement (.50); electronic conferences with S. Bell in response to Defendants' defense of pay plan (.20)	
06-12-15	Electronic conferences with clients regarding details of pay plan in response to Defendants' statements (.20); electronic conference with G. Guzman regarding pay plan and review of documents from same (.40)	.60
06-14-15	Prepare draft of Joint Preliminary Report and Discovery Plan (.60)	.60
06-15-15	Forward draft Discovery Plan to opposing counsel (.10); electronic conferences with clients regarding on-call and buffer time (.30)	.40
06-16-15	Electronic conference with B. Stillwagon regarding Discovery Plan (.10)	.10
06-19-15	Review Defendants' revisions/additions to Discovery Plan and electronic conferences with B. Stillwagon regarding same (.20); review documents and information from clients in preparation of drafting Plaintiffs' Initial Disclosures and draft/finalize same and follow-up electronic conferences with same (1.80)	2.00
06-20-15	Review Defendants' Initial Disclosures (.10)	.10
06-29-15	Review documents and information from S. Bell (.40); review Court Order regarding Scheduling Order (.10)	.50
06-30-15	Review information and documents from clients in preparation of drafting Plaintiffs' First Continuing Interrogatories to Defendants and draft same (2.80); draft Plaintiffs' Request for Production of Documents (2.00); electronic conference with opposing counsel regarding discovery and pay	4.90

	plan (.10)	
07-23-15	Review Court electronic filing of Defendants' Certificates of Service of discovery (.10)	.10
07-24-15	Electronic conference with opposing counsel's office with courtesy copies of Defendants' written discovery (.10)	.10
07-30-15	Review Court electronic filing of Defendants' Certificates of Service of responses to Plaintiffs' written discovery (.10); electronic conference with opposing counsel's office with courtesy copies of Defendants' responses (.10)	.20
07-31-15	Electronic conference with opposing counsel's office regarding documents (.10)	.10
08-06-15	Review Defendants' Interrogatories and Request for Production of Documents and prepare outline of required information/documents and forward to clients with detailed explanation of required discovery responses (3.10); review Defendants' Responses to Plaintiffs' First Continuing Interrogatories and Plaintiffs' Request for Production of Documents and electronic conference with clients regarding same (1.00); numerous electronic conferences with clients regarding documents and information needed (1.00)	5.10
08-07-15	Review draft responses to discovery from G. Guzman (.50)	.50
08-10-15	Electronic conferences with clients regarding discovery responses (.20)	.20
08-12-15	Review draft discovery responses from S. Bell (.50); electronic conference with opposing counsels' office regarding document production (.10)	.60
08-13-15	Review draft discovery responses from	1.10

	A. Hart (.50); electronic conference with B. Stillwagon regarding Confidentiality Agreement and review same (.20); review additional discovery information from G. Guzman (.20); review discovery information from J. Brown (.20)	
08-14-15	Review draft discovery responses from J. Taylor (.40)	.40
08-17-15	Electronic conferences with B. Stillwagon regarding Confidentiality Agreement (.20)	.20
08-22-15	Electronic conference with A. Hart regarding case (.10)	.10
08-28-15	Draft discovery responses on behalf of S. Bell, A. Hart, J. Taylor, J. Brown and G. Guzman	1.50
08-29-15	Electronic conference with clients regarding case status and updates (.10); electronic conferences with S. Bell regarding her discovery responses (.30); electronic conferences with G. Guzman regarding his discovery responses (.20); electronic conferences with J. Taylor regarding her discovery responses (.20); electronic conferences with J. Brown regarding her discovery responses (.20); electronic conferences with A. Hart regarding her discovery responses (.30); electronic conferences with clients regarding documents produced by Defendants (.20); electronic conferences with clients regarding possible mediation (.10); electronic conferences regarding verifications (.10)	1.70
09-01-15	Electronic conferences with B. Stillwagon regarding extending discovery and possible mediation (.10); electronic conferences with S. Bell regarding witness testimony (.20); multiple detailed discussions with	1.10

	clients regarding discovery issues, possible mediation, possible witnesses, etc. (.90)	
09-04-15	Review electronic Court filing of Court Order granting Motion for Extension of Time to Complete Discovery (.10)	.10
09-10-15	Multiple electronic conferences with staff regarding the review of documents produced by Defendants (.20)	.20
10-01-15	Electronic conferences with clients regarding update in case (.20)	.20
10-12-15	Electronic conferences from opposing counsel regarding requests for settlement demand (.10)	.10
10-14-15	Multiple electronic conferences with clients regarding Defendants' documents and preparation of settlement demand	.20
10-15-15	Multiple electronic conferences with clients regarding Defendants' documents and preparation of settlement demand	.20
10-18-15	Review documents, buffer sheets, on-call schedules, telephone records, e-mails, etc. produced by Defendants in preparation of conference with clients	1.80
10-19-15	Review documents, buffer sheets, on-call schedules, telephone records, e-mails, etc. produced by Defendants in preparation of conference with clients, and conference with same to go through Defendants' documents and other case details	4.90
10-29-15	Electronic conference with B. Stillwagon regarding documents and information needed to formulate settlement demand (.10); review buffer and on-call sheets and draft internal proposed settlement document (2.00)	2.10
11-02-15	Electronic conference with B. Stillwagon	.10

	regarding Defendants' supplemental production (.10)	
11-05-15	Electronic conferences with clients regarding determining how many on-call and buffer shifts worked and review relevant documents regarding same	.50
11-06-15	Electronic conferences with clients regarding determining how many on-call and buffer shifts worked and review relevant documents regarding same (1.00); review buffer and on-call sheets and other relevant documents and draft internal proposed settlement document (1.50)	2.50
11-07-15	Electronic conferences with client regarding determining how many on-call and buffer shifts worked and review relevant documents regarding same (.20)	.20
11-09-15	Review buffer and on-call sheets and other relevant documents and draft internal proposed settlement documents and draft preliminary calendars for clients in preparation of creating settlement demand and conference call with clients (2.30)	2.30
11-10-15	Electronic conferences with clients regarding creating calendars to show when they worked in preparation of conference call, review relevant caselaw re: multiple positions, and conduct extensive conference call with clients to go through calculation of settlement demand and begin preparing settlement calculations (3.40)	3.40
11-11-15	Electronic conference with B. Stillwagon regarding possible settlement (.10)	.10
11-12-15	Continued review of documents relevant to settlement offer in preparation of making same (.50)	.50

11-16-15	Electronic conferences with clients regarding settlement calculations for review prior to providing to Defendants (.20); electronic conference with B. Stillwagon providing initial settlement demand to Defendants (.10)	.30
11-24-15	Electronic conference with B. Stillwagon regarding discovery and depositions (.10)	.10
11-25-15	Respond to B. Stillwagon regarding discovery (.10)	.10
12-02-15	Electronic conference with B. Stillwagon regarding filing another Motion for Extension of Time to Complete Discovery (.10)	.10
12-06-15	Electronic conference with B. Stillwagon regarding extending discovery (.10); electronic conferences with clients regarding update/status of case (.20)	.30
12-07-15	Review Court Order granting Joint Motion for Extension of Time to Complete Discovery (.10); electronic conference with B. Stillwagon regarding settlement (.10)	.20
12-14-15	Electronic conference with clients regarding case (.10)	.10
12-15-15	Electronic conference with clients regarding case (.10)	.10
12-16-15	Provide attorney fee estimate to B. Stillwagon for purposes of settlement	.10
12-22-15	Review Defendants' counteroffer and electronic conferences with clients regarding same (.50)	.50
12-23-15	Multiple electronic conferences with clients regarding Defendants' counteroffer (.50)	.50
01-4-16	Electronic conference with B. Stillwagon regarding deposition schedule (.10)	.10
01-06-16	Electronic conferences with clients	.10

	regarding depositions (.20)	
01-11-16	Significant number of electronic conferences with clients regarding their depositions and possible depositions of Defendants' witnesses and corporate witness and possible testimony of same (.20); electronic conference with T. Martin regarding defending depositions (.10); draft detailed summary of case for file in preparation of depositions (2.2)	4.30
01-13-16	Significant number of electronic conferences with clients regarding discovery, deposition issues, Defendants' Offers of Judgments, settlement, etc. (1.30); electronic conference with B. Stillwagon regarding electronic discovery search (.10)	1.40
01-14-16	Draft outline for deposition preparation and in preparation for conference call with clients and conduct conference call with clients to prepare for depositions (2.70); electronic conferences with B. Stillwagon regarding deposition schedule (.20); electronic conferences with T. Martin regarding defending client depositions (.10)	3.00
01-15-16	Electronic conference with B. Stillwagon regarding electronic discovery (.10)	.10
01-17-16	Electronic conferences with clients regarding depositions (.20)	.20
01-18-16	Electronic conferences with T. Martin regarding defending depositions (.20); multiple electronic conferences with clients regarding case (.20)	.40
01-20-16	Electronic conferences with clients and T. Martin regarding depositions, discovery, case issues, etc. (.50)	.50
01-22-16	Electronic conference with T. Martin regarding Defendants' alleged stipulation	.10

01-25-16	Electronic conference with T. Martin regarding case issues	.10
01-26-16	Review e-mail from B. Stillwagon from 01-21-16 regarding outstanding discovery issues and send response regarding electronic discovery (.50)	.50
01-27-16	Review documents/information from S. Bell (.30)	.30
01-28-16	Electronic conference with T. Martin regarding case issue	.10
01-29-16	Electronic conference with T. Martin regarding case issue	.10
01-30-16	Electronic conferences with T. Martin regarding case issues	.20
02-03-16	Electronic conference with T. Martin regarding case issues	.20
02-04-16	Electronic conference with T. Martin regarding case issues	.10
02-05-16	Review pay records and relevant e-mails produced to determine possible docking of pay issue, research caselaw regarding same, and electronic conference with T. Martin regarding same	2.00
02-08-16	Multiple electronic conference with T. Martin regarding case issue	.50
02-09-16	Electronic conference with T. Martin regarding case issue	.10
02-11-16	Electronic conference with T. Martin regarding case issue	.20
02-12-16	Research caselaw regarding administrative exemption, staffing coordinators, salary basis, docking pay, etc., review documents regarding same, and draft legal memo for file (2.70); electronic conference with T. Martin regarding case (.10)	2.80
02-16-16	Multiple detailed electronic conferences with T. Martin regarding issues in case	.90
02-22-16	Electronic conference with T. Martin regarding case issues	.10

02-24-16	Research and review of deposition transcript of K. Adams from another case in preparation of deposition (.60); research caselaw regarding individual liability and draft internal legal memo and questions for deposition regarding same (2.00); electronic conferences with T. Martin regarding same	2.90
02-26-16	Multiple detailed electronic conferences with T. Martin regarding issues in case	.20
02-27-16	Multiple detailed electronic conferences with T. Martin regarding issues in case	.30
02-28-16	Electronic conferences with T. Martin regarding discovery documents	.20
03-03-16	Begin preparing deposition notice pursuant to 30(b)(6), review of documents, deposition transcripts regarding possible topics for same (.40); electronic conferences with T. Martin regarding case issues (.20)	.60
03-08-16	Continue preparing deposition transcript for 30(b)(6) witness and forward draft to T. Martin (.70)	.70
03-09-16	Electronic conferences with T. Martin regarding corporate witness deposition	.30
03-21-16	Electronic conference with T. Martin regarding proposed stipulation	.10
03-23-16	Electronic conference with T. Martin regarding case issues	.10
03-24-16	Electronic conferences with T. Martin regarding deposition notice of corporate witness	.30
03-26-16	Electronic conferences with T. Martin regarding corporate witness deposition and outline	.30
03-28-16	Electronic conferences with T. Martin regarding case issues	.20
03-29-16	Electronic conferences with T. Martin regarding case issues	.20
03-30-16	Electronic conferences with T. Martin	.20

	regarding case issues	
03-31-16	Electronic conference with T. Martin regarding case issues	.10
04-03-16	Electronic conference with T. Martin regarding case issues	.10
04-04-16	Electronic conference with T. Martin regarding case issues	.10
04-24-16	Electronic conference with T. Martin regarding Plaintiff Hart	.10
06-20-16	Electronic conferences with T. Martin regarding original settlement offer and updated fees calculation	.20
06-22-16	Electronic conferences with T. Martin regarding settlement issues	.30
06-24-16	Electronic conferences with T. Martin regarding settlement issues	.30
08-03-16	Draft Motion for Extension of Time to File Motion for Attorney Fees and Expenses and electronic conference with B. Stillwagon regarding same	.20
08-04-16	Electronic conference with B. Stillwagon regarding extension	.10
08-05-16	Finalize Motion for Extension and file same	.10
08-11-16	Detailed review of attorney invoices to prepare for filing and conduct research for Motion for Attorneys' Fees and Expenses and begin drafting same	3.30
08-12-16	Continuation of research for Motion for Attorneys' Fees and Expenses and continue drafting same	3.50
08-14-16	Review invoices in preparation of filing Bill of Cost, research costs permitted under statute, and draft Bill of Costs; continue drafting Plaintiffs' Motion for Attorneys' Fees and Expenses	2.80
08-15-16	Finalize attorney/paralegal invoices, continue research and drafting of Plaintiffs' Motion for Attorneys' Fees and Expenses and finalize and file same	6.00

EXHIBIT A 3
Bell et al v. Accord Services et al
Paralegal Time for M. Smith

Date 2016	Description		Time
2/24	Conference regarding project related to electronic document searches in case, and categorizing approximately 36,000 e-mails in case for future review to determine shifts that Plaintiffs worked and begin project		3.00
2/25	Electronic conference with T. Martin regarding project		.10
2/26	Electronic conference with T. Martin regarding project		.10
2/27	Continuation of review, search and narrowing of approximately 36,000 e-mails into separate files for future review in order to determine shifts worked		2.80
2/28	Continuation of project review including isolation of e-mails by Plaintiffs' names		2.00
2/29	Continuation of name searches		2.00
3/1	Continuation of review, search and narrowing of e-mails to help determine shifts worked by five Plaintiffs		2.00
3/2	Electronic conferences with T. Martin regarding project		.20
3/3	Continuation of review, search and narrowing of e-mails into separate files		2.80
3/4	Breaking down files by Plaintiff name to continue review, search and narrowing of e-mails		2.00
3/7	Breaking down files by Plaintiff name to continue review, search and narrowing of e-mails		3.00
3/9	Continuation of project related to 36,000 e-mails		1.5
3/10	Continuation of project related to 36,000 e-		1.5

	mails		
3/11	Continuation of project related to 36,000 e-mails		.50
3/13	Electronic conferences regarding issues regarding electronic discovery		.50
3/15	Move some files onto .pdf for e-mail purposes		1.00
3/16	Transmission of files/conversion to form to be copied		.50
3/17	Copy files onto thumb drive		.50
3/18	Conference with T. Martin regarding project		1.00
3/19	Continue project including Disco consolidation for e-mails / topic breakdown		1.00
3/20	Continue project / “on-call” breakdowns		1.00
3/21	Continue project / finalize breakdowns of name/tasks/dates		1.00
3/22	Continue project / print documents		3.00
3/23	Continue project / conference with T. Martin regarding phone records and electronic conference on definitions of “on call”		1.10
3/24	Continue project / begin working on first phone list including creating pleading of daily totals		3.90
3/25	Continue project / work on phone records for Plaintiff Brown including creating pleading of daily totals		3.00
3/26	Continue project / work on phone records for Plaintiff Brown including creating pleading of daily totals		2.00
3/28	Electronic conference with T. Martin regarding Plaintiff Brown’s records including creating pleading of daily totals		.10
3/29	Electronic conferences regarding phone records		.90
3/30	Continuation of project work including work on phone records for Plaintiff Taylor		3.00
3/31	Continue project / work on phone records for Plaintiff Taylor		1.00
4/1	Continue work on phone records for Plaintiff Taylor		1.00
4/2	Scan certain phone records		.50
4/3	Continue work on phone records		.50

4/8	Continuation of work on phone records	.10
4/17	Continuation of project	3.90
4/19	Continuation of project and conference with T. Martin regarding same	3.00
4/20	Work on phone records for Plaintiff Guzman	2.00
4/21	Continuation of project work for Plaintiff Guzman	3.00
4/22	Continuation of project work for Plaintiff Guzman	5.00
4/25	Plaintiff Guzman phone record review and collection	3.00
4/28	Finish work on Plaintiff Guzman records	2.00
4/29	Continuation of project work for Plaintiff Guzman	1.00
5/2	Continuation of project work for Plaintiff Guzman	2.00
5/4	Finish project work for Plaintiff Guzman / work on Plaintiff Hart's documents	4.00
5/7	Work on documents for Plaintiff Hart and create pleading of daily totals	3.00
5/8	Work on documents for Plaintiff Hart	3.00
5/9	Continuation of project work for Plaintiff Hart	2.00
5/12	Continuation of project work	5.00
5/13	Continuation of project work for Plaintiff Hart	2.00
5/14	Continuation of project work for Plaintiff Hart	3.00
5/15	Continuation of project work for Plaintiff Hart	4.00
5/16	Continuation of project work for Plaintiff Hart	2.00
5/17	Continuation of project work for Plaintiff Hart	1.00
5/18	Scan relevant documents for review	1.00
5/19	Continuation of project review	4.00
5/20	Continuation of project review	2.00
5/21	Continuation of project review	2.00
5/22	Continuation of project review	3.00
6/22	Continuation of project review	4.00
6/23	Continuation of project review	4.00

Exhibit A4 - Hall v. Accord Services et al

Attorney Time Records

Date	Description	Timekeeper	Time
3/15	Review information from Plaintiff Hall in preparation of drafting Complaint and caselaw on independent liability and draft/review/file Plaintiff Hall's overtime Complaint	T. Martin	2.50
3/16	Review documents and information and documents from Plaintiff Hall	T. Martin	.40
4/4	Review Defendants' Answer	T. Martin	.40
4/20	Prepare for and conduct Rule 26f conference	T. Martin	.40
4/20	Review Judge Totenberg's Standing Order	T. Martin	.10
4/20	Review/revise Joint Preliminary Report and Discovery Plan	T. Martin	.60
4/20	Review Judge Totenberg's Notice Regarding FLSA Cases	T. Martin	.10
4/29	Review Proposed Rule 502(d) Order	T. Martin	.30
5/4	Review Defendants' Initial Disclosures by Defendants	T. Martin	.30
5/17	Review Court Order approving Joint Preliminary Report and Discovery Plan and Order to file joint statement regarding consolidation.	T. Martin	.10
5/20	Prepare Joint Statement regarding consolidation	T. Martin	.50
6/1	Review Defendants' Certificate of Interested Persons and Corporate Disclosure Statement	T. Martin	.10
8/15	Draft/review/finalize Plaintiffs' Motion for Attorneys' Fees and Expenses and include information related to Hall case to Bell's Motion for Attorneys' Fees	K. Martin	1.00

Total Attorney Hours: 6.8

Hourly Rate: \$400

Total Fees: \$2,720